

MELINDA HAAG (CABN 132612)
United States Attorney

MIRANDA KANE (CABN 150630)
Chief, Criminal Division

HEATHER M. MELTON (CABN 260870)
Special Assistant United States Attorney

450 Golden Gate Ave., Box 36055
San Francisco, California 94102
Telephone: (415) 436-7200
Fax: (415) 436-7234
E-Mail: heather.melton@usdoj.gov

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

CHARLES MANUEL,

Defendant.

No. CR 13-00215 MEJ

STIPULATION TO CONTINUE
APPEARANCE OF CHARLES MANUEL
AND ~~PROPOSED~~ ORDER TO
EXCLUDE TIME

The defendant, CHARLES MANUEL, represented by RITA BELLE BOSWORTH, Assistant Federal Public Defender, and the government, represented by HEATHER M. MELTON, Special Assistant United States Attorney, jointly request that this matter be continued from May 23, 2013 to June 27, 2013 for a change of plea or to set a trial date. This continuance is requested to allow defense counsel the opportunity to complete her review of the provided discovery, investigate legal issues pertinent to case resolution, and completely advise her client as to the possible risks of trial and benefits of settlement. This continuance is also requested based upon scheduling needs of defense counsel. Counsels also jointly request that time be excluded from the Speedy Trial Act from May 23, 2013 to June 27, 2013 pursuant to 18 U.S.C.

§ 3161(h)(7)(B)(iv). The exclusion of time is based upon the need of both counsels for additional time to effectively prepare and continuity of defense counsel.

DATED: May 22, 2013

Respectfully submitted,

MELINDA HAAG
United States Attorney

By____/s/_____
HEATHER M. MELTON
Special Assistant U.S. Attorney

DATED: May 22, 2013

By____/s/_____
RITA BELLE BOSWORTH
Assistant Federal Public Defender
Attorney for Defendant CHARLES
MANUEL

//

//

//

//

//

//

//

//

//

//

//

//

//

//

//

//

STIPULATION AND PROPOSED ORDER CONTINUING APPEARANCE AND EXCLUDING TIME

Case No. CR 13-00215 MEJ

~~PROPOSED~~ ORDER

The Court hereby continues the appearance in the above-captioned matter to June 27, 2013. Based upon the representations of counsels and for good cause shown, the Court finds that failing to exclude the time between May 23, 2013 and June 27, 2013 would unreasonably deny counsels the reasonable time necessary for effective preparation, taking into account the exercise of due diligence, and continuity of defense counsel. 18 U.S.C. § 3161(h)(7)(B)(iv). The Court further finds that the ends of justice served by excluding the time between May 23, 2013 and June 27, 2013 from computation under the Speedy Trial Act outweigh the best interests of the public and the defendant in a speedy trial. Therefore, IT IS HEREBY ORDERED that the time between May 23, 2013 and June 27, 2013, 2013 shall be excluded from computation under the Speedy Trial Act. 18 U.S.C. § 3161(h)(7)(A) and (B)(iv).

DATED: May 22, 2013



HON. MARIA-ELENA JAMES
United States Magistrate Judge